

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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NOVOSHIP (UK) LIMITED, CALLY :  
SHIPHOLDINGS, INC., VITAL SHIPPING :  
CORPORATIONS, and DAINFORD :  
NAVIGATION INC., :

07 Civ. 9876 (DLC)

**NOTICE OF MOTION**

Plaintiffs,

v.

WILMER RUPERTI, SEA PIONEER SHIPPING :  
CORPORATION, and PMI TRADING, INC., :  
JOHN DOE (fictitious) and JOHN DOE INC. :  
(fictitious), :

Defendants.

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**PLEASE TAKE NOTICE** that, upon the accompanying memorandum of law, and all the prior proceedings in this matter, Defendants Wilmer Ruperti, Sea Pioneer Shipping Corporation and PMI Trading, Inc. will move this Court before the Honorable Denise L. Cote, United States District Judge, at a date and time to be set by the Court, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, to reconsider, pursuant to Local Rule 6.3, the Court's March 19, 2008 Order, and alternatively, for a reduction in the amount of attachment, pursuant to Fed. R. Civ. P. Admiralty Supp. R. E(6), and for such other and further relief as the Court may deem just and proper.

Dated: April 2, 2008

Respectfully submitted,

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